<u>REMARKS</u>

This application has been carefully reviewed in light of the final Office Action dated December 11, 2008. Claims 1 to 6, 8 to 17 and 19 to 21 are in the application. Claims 1 and 12 are the independent claims. Reconsideration and further examination are respectfully requested.

Claim 19 was objected to for an informality which has been attended to by amendment as set out above.

Claims 1 to 6, 8 to 10, 12 to 17, 19 and 21 were rejected under 35 U.S.C. § 103(a) over U.S. Publication No. 2002/0120634 (Min) in view of U.S. Publication No. 2003/0081234 (Wiley) and U.S. Publication No. 2003/0191871 (Tohki). Claims 11 and 20 were rejected under 35 U.S.C. § 103(a) over Min, Wiley, Tohki and U.S. Patent No. 5,884,014 (Huttenlocher). The rejections are respectfully traversed, and their withdrawal is respectfully requested as explained more fully below.

Independent Claims 1 and 12 generally concern processing data in different formats. Data of a first format for respective pages is received, and data of a second format is generated from the data of the first format.

According to one aspect of Claims 1 and 12, a single record is generated, namely, a page data management record. The page data management record manages the data of the first and second formats in association with each other.

By virtue of this feature, it is ordinarily possible to manage plural data formats (e.g., JBIG, JPEG, TIFF) with less memory consumption, because a single page data management record manages the plural data items of the various formats.

Conventionally, separate records are required for each format, as shown in Applicants' Figures. 2A to 2C.

According to another aspect of Claims 1 and 12, the page data management record is deleted if none of a plurality of output processors refer to the page data management record.

By virtue of this arrangement, it is ordinarily possible to preserve the page data management record as long as at least one processor requires the record, while conserving memory by deleting the record once none of the processors refer to the record.

Referring specifically to claim language, independent Claim 1 is directed to a data processing apparatus for processing data for respective pages. The apparatus includes a data reception unit for receiving data of a first format for respective pages, and a data generation unit for generating data of a second format from the data of the first format. The apparatus also includes a control unit for generating a single page data management record that manages the data of the first and second formats in association with each other. In addition, the apparatus includes a plurality of output processors, each for independently executing a respective output process for the data of the first format or the data of the second format. The control unit deletes the page data management record if none of the plurality of output processors refers to the page data management record.

Independent Claim 12 is directed to a method substantially in accordance with the apparatus of Claim 1.

The applied art is not seen to disclose or suggest the features of Claims 1 and 12, and in particular is not seen to disclose or suggest at least the features of (i) generating a single page data management record that manages data of first and second

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formats of respective pages in association with each other, and (ii) deleting the page data management record if none of a plurality of output processors refers to the page data management record.

Page 4 of the Office Action concedes that Min does not teach a single page management unit which manages more than one format of the same page, but relies on Wiley (paragraph [0043]) for this disclosure.

As understood by Applicants, Wiley is directed to a document delivery system. In particular, Wiley is directed to program code for identifying different types of network destinations to receive a document, formatting the document for each of the different types of network destinations, and sending the formatted document to each of the network destinations. See Wiley, Abstract.

The Office Action asserts that Wiley's program code corresponds to a "management section", and appears to equate such management section with the claimed page data management record. Specifically, the Office Action relies on Wiley's paragraphs [0041] and [0043], which respectively recite that "[s]uitable program code may be provided for formatting the document 110 for each of the identified...destinations", and that "the user need not rescan the document 110, and the document 110 may be sent to any of the different types of destinations".

However, Wiley's program code is not seen to correspond to the claimed single page data management record, because Wiley's program code does not manage data of first and second formats in association with each other. In this regard, Wiley's program code converts an input document 110 into a specific format for required for a particular destination, such as email account 140, facsimile 141, printer 142, or other device 143.

See Wiley, paragraph [0041]. Thus, in Wiley, different formats might derive from the same document. For example, Wiley converts document 110 to one format for sending to e-mail destination 140, and converts document 110 into a different format for sending to fax destination 141. See Wiley, paragraphs [0035] and [0043].

Nevertheless, there is no association between any of Wiley's conversions, nor is there any association between the different formats sent to respective destinations. Wiley's program code merely converts document 110 to one format for one destination and to another format for another destination, without ever associating the resultant formats with each other. As a result, Wiley is not seen to manage data of different formats of the same page in association with each other, much less to generate a single page data management record that manages data of first and second formats of respective pages in association with each other.

Min is not seen to remedy the deficiencies of Wiley. In particular, Min is not seen to disclose or suggest a page data management record that manages data of first and second formats in association with each other.

As understood by Applicants, Min is directed to a metadata abstraction interface interposed between multimedia files and applications. The metadata abstraction interface includes metadata decoders for parsing metadata of a multimedia file stored in a native format and rendering the metadata in a generic format for use by applications. See Min, Abstract and paragraphs [0013] and [0014].

Page 3 of the Office Action asserts that Min's generic metadata (paragraph [0014]) corresponds to a page data management record that manages data of first and second formats in association with each other.

However, Min generates a separate generic metadata for a single image file in a single format (e.g., "foo.bmp"), rather than generating a record for plural data formats of the same file. See, e.g., Min, paragraphs [0087] to [0089]. In particular, Min creates an independent generic metadata for an input image file, without discerning whether the image file is simply an old page in a different format. See, e.g., Min, paragraphs [0087] to [0089] and Claim 1. Thus, Min's generic data is not seen to correspond to more than one format, much less to manage data of first and second formats for respective pages in association with each other.

The applied art is also not seen to disclose or suggest deleting the page data management record if none of a plurality of output processors refers to the page data management record.

Page 4 of the Office Action concedes that Min and Wiley do not disclose deleting the page data management record if none of a plurality of output processors refers to the page data management record. Nevertheless, the Office Action relies on Tohki (paragraphs [0016] to [0019]) for this feature.

As understood by Applicants, Tohki is directed to an image output apparatus which performs output processes of a plurality of kinds of image data in different forms, and which includes a storage unit for storing or saving image data which has undergone the output processes. See Tohki, Abstract.

However, the cited portions of Tohki simply disclose a determination of whether or not to store image data which has undergone an output process. See Tohki, paragraphs [0016] to [0019]. More specifically, Tohki allows a user to choose whether to save image data which has undergone a particular output process. See Tohki, paragraph

[0102]. Neverthelss, Tohki's decision of whether to store image data is not seen to correspond to deleting data which is already stored, much less to deleting a page data management record if none of a plurality of output processors refers to the page data management record.

Huttenlocher has been reviewed and is not seen to remedy the deficiencies of Min, Wiley, and Tohki.

Therefore, independent Claims 1 and 12 are believed to be in condition for allowance, and such action is respectfully requested.

The other claims in the application are each dependent from the independent claims and are believed to be allowable over the applied references for at least the same reasons. Because each dependent claim is deemed to define an additional aspect of the claims, however, the individual consideration of each on its own merits is respectfully requested.

An Information Disclosure Statement, with fee and certification, is being filed concurrently herewith. Consideration of the cited art is respectfully requested.

No other matters being raised, the entire application is believed to be in condition for allowance, and such action is courteously solicited.

Applicants' undersigned attorney may be reached in our Costa Mesa, California office at (714) 540-8700. All correspondence should continue to be directed to our below-listed address.

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Respectfully submitted,

/Michael J. Guzniczak/

Michael J. Guzniczak
Attorney for Applicants
Registration No.: 59,820

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FITZPATRICK, CELLA, HARPER & SCINTO
30 Rockefeller Plaza
New York, New York 10112-2200
Facsimile: (212) 218-2200

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